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Nevada State Bar No. 13412

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

SHANIA LIVERPOOL,

Plaintiff,

vs.

COAST TO COAST FINANCIAL
SOLUTIONS, INC.,

Defendant

) Docket No.

) **COMPLAINT AND DEMAND FOR**
) **TRIAL BY JURY**

Plaintiff Shania Liverpool ("Plaintiff") by and through his attorneys, The Law Offices of Robert M. Tzall as and for his Complaint against Defendant Coast to Coast Financial Solutions, Inc., ("Defendant") respectfully sets forth, complains and alleges, upon information and belief, the following:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as well as 15 U.S.C. § 1692 *et seq.* and 28 U.S.C. § 2201.
2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2).

1 12. As a result of Defendant's improper debt collection practices described above, Plaintiff
2 has been damaged.

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4 **FIRST CAUSE OF ACTION**
5 **(Violations of the FDCPA)**

6 13. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though
7 fully stated herein with the same force and effect as if the same were set forth at length
8 herein.

9 14. Defendant's debt collection efforts attempted and/or directed towards Plaintiff violate
10 various provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692e,
11 1692e(2)(B), 1692e(10), 1692f, and 1692f(1).

12 15. As a result of the Defendant's violations of the FDCPA, Plaintiff has been damaged and is
13 entitled to damages in accordance with the FDCPA.
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16 **DEMAND FOR TRIAL BY JURY**

17 16. Plaintiff demands and hereby respectfully requests a trial by jury for all claims and issues
18 in this complaint to which Plaintiff is or may be entitled to a jury trial.
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PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment from the Defendant as follows:

- a) For actual damages provided and pursuant to 15 U.S.C. § 1692k(a)(1);
- b) For statutory damages provided and pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c) For attorney fees and costs provided and pursuant to 15 U.S.C. § 1692k(a)(3); and
- d) For any such other and further relief, as well as further costs, expenses and disbursements of this action as this Court may deem just and proper.

DATED, this 31st day of March, 2016

/s/Robert M. Tzall

Robert M. Tzall

The Law Offices of Robert M. Tzall

Attorneys for Plaintiff